

20210

## ER/WM&amp;I DDT



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Control #, if applicable)

**Due Date**

L. Peterson-Wright  
**Originator Name**

R. S. Luker  
**QA Approval**

<sup>ALP/initials</sup>  
for J. E. Law  
A. M. Tyson  
**Contractor Manager(s)**

Ann K. Sieben  
**Kaiser-Hill Program Manager(s)**

T. G. Hedahl  
**Kaiser-Hill Director**

Document Classification  
Review Waiver Per  
Classification office

**Document Subject:**

KH00003NS1A

Transmittal of Comment Responses for Operable Unit 7 Decision Document- AMT-026-96

July 25, 1996

96-RM-ER-0124-KH

**Discussion and/or Comments:**

This letter transfers responses to three comments requiring clarification based on DOE letter AME:RWT:09989 dated July 1, 1996.

The responses to two of the comments have been deferred until the RFCA Implementation Document is completed and approved as agreed during the June 20, 1996, meeting with DOE, CDPHE, EPA, Kaiser-Hill and RMRS. This letter and attachment will be placed in the Project Records Center for future reference.

LJPW:slm

Attachment:  
As Stated

cc:  
J. E. Law  
L. J. Peterson-Wright  
A. M. Tyson  
RMRS Records



**ADMIN RECCRD**

Date

James K. Hartman  
Acting Assistant Manager for Environmental Compliance  
DOE, RFFO

CLARIFICATION OF COMMENT RESPONSES FOR OPERABLE UNIT 7 DECISION  
DOCUMENT-AKS-XXX-96

This letter transfers responses to three comments requiring clarification based on your letter dated July 1, 1996.

The responses to two of the comments have been deferred until the RFCA Implementation Document is completed and approved. This letter and attachment will be placed in the Project Records Center for future reference.

If you have any questions concerning this transmittal, please contact me extension 9886.

Ann K. Sieben  
Kaiser-Hill, L.L.C.

XXX:xxx

Attachment:  
As Stated

cc:

## REVIEW COMMENT SHEET

Return comments to:	Tom Lindsey	T893A	5705	2623	Comment Due Date:
	Name	Bldg.	Phone	fax	
Document:	Number	O	Draft	OU 7 IM/IRA Decision Document	
		Rev	Draft or Final	Title	
General (G) comments require resolution but do not require resolution acceptance. Mandatory (M) comments require resolution and resolution acceptance. 1 A03-PPG-004 provides complete definitions of General and Mandatory comments.					

TYPE G or M	PAGE	SECTION or LINE #	COMMENT	DISPOSITION	Disposition accepted initial & date
Based on a recent meeting with DOE, Kaiser-Hill, RMRS, CDPHE and EPA, the disposition of two comments and subsequent revision of the document, has been deferred until the RFCA Implementation Document is completed and approved. Additionally, revision of the Decision Document has been removed from the scope of the Operable Unit (OU) 7 Project. These comments and responses will be placed in the Project Record Center for future reference.					
	Comment Response M-3		The response indicates that a renewed evaluation of ground and surface water interactions and modeling is ongoing as a means to address the comment. It is suggested that further technical review of RMRS assessment be conducted to insure that the assessment is adequate and is in the best interest of DOE from a cost and compliance standpoint.	Pursuing evaluation of ground and surface water interaction was not a cost-effective method to address the comment.  The IM/IRA Decision Document will be revised and will not rely upon the assumption that No Name Gulch is a losing stream.	
2	Comment Response M-7		The response to comment M7 indicates that the cost of a stand-alone leachate treatment facility "will be reviewed and revised if appropriate". The comment response does not address the comment and further explanation is required. The comment basically asks if the full annualized O&M cost for operating the OU-1/2 treatment facility was used when costs were compared for OU-7	The full actual annualized O&M costs for OU1/OU2 were divided by the total actual gallons treated to determine a cost per gallon for the comparative analysis. (Note: the OU 7 leachate would be the major contributing waste stream to the OU1/OU2 system).  Based on the calculated \$0.41/gallon coupled with the labor involved with trucking the	

_____ No Comments  _____ Reviewer's Name  _____ Signature  _____ Bldg. / Dept. / Company _____ Ext./Pager/Fax	Resolutions Accepted	_____ Signature _____ Date	Page 1 of 2
	_____ Date		

TYPE G or M	PAGE	SECTION or LINE #	COMMENT	DISPOSITION	Disposition accepted initial & date
			<p>alternatives, rather than an appropriate proportionate amount. The comment response talks about trucking costs and appears to insinuate that trucking water to OU-1/2 is more expensive than building a treatment facility. Further explanation should be requested that addresses the following two questions:</p> <ol style="list-style-type: none"> <li>1. Was the full annualized O&amp;M cost for the OU-1 treatment facility used when comparing costs for the OU -7 alternative?</li> <li>2. Is the trucking alternative more expensive than design and build of a treatment facility and why?</li> </ol>	<p>leachate every three days, the calculated total costs appears to be greater than the estimated cost for the design and build of a treatment facility at OU 7.</p> <p>Rather that expend the resources to reanalyze and recalculate the cost estimates, it is recommended that reevaluation of leachate treatment options, once the RFCA Implementation Document has been completed and approved, would be the logical first step. Once treatment standards and the point of compliance are determine for OU 7, treatment options, which may or may included treatment at OU1/OU2 or a treatment facility at OU7, will be reevaluated.</p>	
3			<p>Further analysis of a treatment option for all contaminants of concern is needed. The stand-alone treatment facility, OU1/OU2 existing facility and engineered wetlands can treat for the full suite of contaminants of concern. With the low levels of organics in the leachate, the engineered wetland could achieve with an aerobic section and/or cascade transfer between cells. The analysis should be revised per M12 as long as a caveat is included on Winter treatment efficiency, and no other (new) alternatives/technologies are necessary.</p>	<p>At the June 20, 1996 meeting with DOE, Kaiser-Hill, CDPHE, EPA and RMRS, it was decided that evaluation of treatment options for the leachate would be premature at this time. Reevaluation of treatment options will be conducted when the RFCA Implementation Document has been completed and approved and when budget is available.</p>	

Reviewer's Name \_\_\_\_\_

Ext./Pager/Fax \_\_\_\_\_

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Date \_\_\_\_\_

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